

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

J.G. WENTWORTH SSC)	CASE NO. 1:01-cv-00192-HJW
LIMITED PARTNERSHIP,)	
)	JUDGE WEBER
Plaintiff,)	
)	MOTION FOR ORDER THAT
vs.)	FUNDS BE DEPOSITED WITH
)	COURT
LINDA CALHOUN WILLIAMS,)	
)	
Defendant.)	

As the direct result of a state lawsuit filed against – but never actually served upon – Plaintiff J.G. Wentworth SSC Limited Partnership ("Wentworth"), it has become necessary to move this Court for an Order requiring that all monies received from First Colony Life Insurance Company or its successors or assigns as set forth in Wentworth's Complaint and at issue in this lawsuit, which are currently held in an escrow account controlled by Defendant's counsel, be deposited with this Court, and that any future monies received, pending the Court's determination of the rightful ownership of those funds, also be deposited with this Court. This motion is necessitated by recent activity in of the Highland County, Ohio, Probate Court that threatens the security of those funds and, therefore, Wentworth's interest in them. A Memorandum in Support of this Motion is attached.

Respectfully submitted,

/s/ James S. Wertheim

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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2004, a true copy of the foregoing was served via regular U.S. mail, postage prepaid, on:

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